

Memorandum

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To: HOWARD KUO
Associate Right of Way Agent
Right of Way Airspace District 07
Division of Right of Way

Date: April 10, 2020
File: 07-LA-10
Property Lease for
Homelessness
Solutions
EFIS: 1847-0714901665
RC: EON2320

From: PENNY NAKASHIMA, P.G. *pn*
Senior Engineering Geologist
Hazardous Waste Branch - North Region
Office of Environmental Engineering (OEE)

Subject: **HAZARDOUS WASTE ASSESSMENT OF PARCEL FOR AIR SPACE LEASE FOR HOMELESSNESS SOLUTIONS LOCATED AT 16TH STREE AND MAPLE AVENUE, LOS ANGELES**

The Office of Environmental Engineering (OEE), Hazardous Waste North Branch (HWN) has received your request for review of the Plans submitted by the City of Los Angeles (City) to lease the airspace at a parcel located at 1616 Maple Avenue, Los Angeles for their homelessness program. The City submitted plans for the proposed shelter consisting of 63 units of pallet shelters containing a total of 109 beds, portable Water Closet (WC), hand washing stations, outdoor seating areas, planter boxes, chainlink fence, an administrative trailer, and aluminum deck ramp and stairs. The existing concrete foundations from previous structures used for the Materials Laboratory will be used to anchor the housing units. No structures will be allowed underneath the freeway, however, portable WC and hand washing stations may be consolidated under the freeway.

SB 211, signed on September 26, 2019, authorizes Caltrans to lease property located anywhere in the State for the purpose of a temporary emergency shelter or feeding program. Governor Newsom signed Executive Order N-23-20 on January 8, 2020, requiring Caltrans to list properties available for rent for potential shelter site and develop a model lease template. The lease agreement requires renter to evaluate lead concentrations before the lease is signed. If lead concentrations do not meet the Department of Toxic Substances Control (DTSC) determined level for clean soil with unrestricted use (80 mg/kg total lead or 5 mg/L soluble lead), the renter must develop and implement a mitigation plan under DTSC's oversight. Caltrans' role is to: 1) disclose all information available on the property proposed for use; 2) provide oversight of renter's site evaluation; 3) evaluate lead data; and, 4) refer potential renter to DTSC when lead concentrations exceed 80 mg/kg total lead or 5 mg/L soluble lead, or contamination other than lead is suspected or exists on the site. DTSC will make specific recommendations regarding site remediation and determining health risk to residents that will reside in the emergency shelter.

The information available to OEE on the parcel is summarized below and needs to be disclosed to the City.

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Background

The parcel proposed for use as an Emergency Homelessness Shelter is located at 1616 Maple Avenue, Los Angeles, CA 90015. The Site is bounded to the north by 16th Street, to the east by Wall Street, to the west by Maple Avenue, and to the south by industrial buildings and Washington Boulevard. Interstate 10 passes over the parcel.

The parcel was previously used by Caltrans as the site of the Materials Laboratory (Mat Lab) to analyze various materials, soil core samples, and rock core samples for geotechnical properties. All structures on the parcel have been demolished and all debris from the demolition of the structures have been disposed. The Mat Lab parcel housed two 250 gallon solvent underground storage tanks (USTs), one used for fresh solvent and one used for spent solvent. The solvent in the tanks was a hydrocarbon solvent, Naphtha. Each UST was 8 ft W x 13 ft L x 5 ft H. During UST removal, the top of USTs and piping were encountered at 3 ft bgs and bottom of tank at 8 ft bgs. The tanks were spaced 4 ft apart from each other.

After UST removal, the soil in the excavation beneath the tanks was sampled, one sample collected at the east end and one sample collected at the west end. The samples were collected from the bucket of the backhoe, placed in jars, and analyzed for total petroleum hydrocarbons-gasoline range organics (TPHg), total recoverable petroleum hydrocarbons (TRPH), gasoline constituents benzene, toluene, ethyl benzene, xylene (BTEX), and the oxygenate methyl tertiary butyl ether (MTBE). The sample collection methodology used is not what is required by USEPA to minimize the loss of volatile organic compounds (VOCs) and may not be representative of the impacted soil. Soil sampling for analysis of VOCs and TPHg requires use of USEPA Method 5035, a method designed to minimize loss of VOCs. TPHg was detected at 0.97 mg/kg in one sample. This may indicate that some of the solvent may have been released at some time in the past. All other constituents, BTEX, MTBE, and TRPH were not detected (ND < 0.005 mg/kg). The report states that the tanks were in good condition because no holes or leaks in the USTs were observed when removed in Sept 1998 and that materials from the excavation of the USTs were used for backfill of the excavation with placement of one foot of pea gravel on top of soil. No information was available to determine if the USTs that were removed were replacement USTs from previously leaking USTs. The UST removal was overseen by the City Fire Department. Geotracker does not show this site on its database.

Historical Aerial Photographs

Historical aerial photographs were viewed from the years 1948, 1952, 1964, 1972, 1989, 2003, 2009, and 2016 (link: historicalaerial.com) to obtain information on past use of the parcel. The 1948 and 1952 aerial photos show the parcel as a residential neighborhood, with no commercial or industrial buildings or Interstate 10 Freeway. The 1964 aerial photo shows the I-10 Freeway passing over the parcel, two main buildings, one to the north of the I-10 and one to the south of

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the I-10, with the same footprint as the Mat Lab prior to its demolition, and a few houses and commercial/industrial buildings south of the parcel. The 1972 aerial photo shows a small structure to the east of the main building at the north end of the parcel and fewer houses to the south of the parcel. The 1989 aerial photo shows all houses have disappeared and the area is completely commercial/industrial buildings. The 2003, 2009, and 2016 aerial photos show the parcel has not changed in use, the same buildings are observed.

Current Condition of the Parcel and Site Reconnaissance

Current aerial photos of the parcel were viewed from Google Maps (dated March 2019 and 2020) show all the structures on the parcel were razed, concrete foundations from the two main buildings remain, pavement covers the majority of the parcel, and unpaved areas exist adjacent to the columns of I-10, at small areas on the perimeter of the parcel adjacent to the fence line, and in small areas on the parcel. Some of the paved areas have staining on the concrete. Tents and debris were observed on the parcel. No visible signs of hazardous waste were observed on the parcel.

Outside of the parcel and adjacent to the city owned sidewalk, unpaved soil areas with vegetation were observed. The area surrounding the parcel is highly developed with industrial/commercial buildings.

To the east of the parcel on Wall Street is a Caltrans owned parcel that housed a UST containing ethanol for fueling state vehicles. No records were found showing that the UST was removed. The Geotracker database does not contain information on this UST.

On April 8, 2020, Division of Right of Way conducted a site reconnaissance of the parcel. Pictures of the parcel confirm what was observed in the Google Maps aerial view of the parcel, identified areas on the parcel with unpaved soil and some cracks in the pavement overlying the parcel.

Aerially Deposited Lead

We were unable to find a previous site investigation that was performed at the parcel for aerially deposited lead in our library. However, based on the location of the parcel being directly under the heavily travelled I-10 Freeway and past use of leaded gasoline, there is a high probability that the unpaved soil areas on the parcel and around the perimeter of the parcel at the columns and fence will contain hazardous waste concentrations of lead.

Environmental Database Review

Departments within the California Environmental Protection Agency maintain online data management systems for tracking environmental cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known or suspected contamination issues. For this HWA we reviewed the “Geotracker” database maintained by the

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California State Water Resources Control Board (SWRCB) and the “Envirostor” database maintained by the Department of Toxic Substances Control (DTSC).

Three former UST release sites were identified on Geotracker and Envirostor within 600 feet to 1000 feet from the parcel. The parcel is surrounded by heavy industry and contains former USTs, not all of which are not shown on Geotracker and Envirostor databases.

The USTs on 17th Street and Grand, on the 16th Street and Maple Avenue parcel, and on the parcel on 16th Street and Wall Street that is directly east of the 16th Street and Maple Avenue parcel did not appear on either of the environmental databases.

Conclusion and Recommendation

The areas of unpaved soil are a concern for aerially deposited lead because of the parcel being directly underneath the heavily travelled I-10 Freeway. Other types of contamination from use by the Mat Lab may exist in the subsurface from the naphtha stored in the USTs and may migrate through the cracks in the slabs, around the slabs, and the unpaved soil. The former USTs that were removed in 1989 are a concern for vapor intrusion issues.

The City needs to contact the DTSC to get their involvement and let DTSC know that there was past chemical use at this property. The DTSC will determine what information is needed to make the public health decision for use of the property.

Please inform the City that they will have to perform their due diligence prior to signing the lease for the use of the parcel.

The information provided in this memorandum is for the proposed use as provided to OEE and based on documents that were available to OEE at the time of preparation. If the use changes or plans for the shelter change, a Hazardous Waste Re-Assessment will be required.

If you have any questions or need additional information, please call me at (213) 897-0670, Penny.Nakashima@dot.ca.gov.

Attachments

cc: Perry Myers, Department of Toxic Substances Control
Kim Christmann, Caltrans HQ DEA
Jeffrey Newman, Caltrans Task Force Lead D07